IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PAIGE ROBBINS,	:	
Plaintiff	: :	
VS.	: :	
LOWER MERION SCHOOL DISTRICT,	: : C	IVIL ACTION No.: 11-7495
And	:	
THE BOARD OF DIRECTORS OF THE LOWER MERION SCHOOL DISTRICT,	: : :	
And	: :	
CHRISTOPHER W. McGINLEY,	:	
Defendants.	: :	
<u>ORDER</u>		
AND NOW, this	day of	, 2011, Plaintiff's Motion
for Permission to Withdraw as Counsel is hereby GRANTED, and it is hereby ORDERED and		
DECREED that Bogan Law Group, LLC, and attorney Mary Elizabeth Bogan, Esq., are		
withdrawn as attorneys for Plaintiff, Paige Robbins, in the above-captioned matter.		
BY THE COURT:		
Honorable John R. Padova		

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PAIGE ROBBINS,

Plaintiff

vs.

LOWER MERION SCHOOL DISTRICT,

And

THE BOARD OF DIRECTORS OF THE LOWER MERION SCHOOL DISTRICT,

And

CHRISTOPHER W. McGINLEY,

Defendants.

CIVIL ACTION No.: 11-7495

MOTION FOR PERMISSION TO WITHDRAW AS COUNSEL

AND NOW, comes Movant, Bogan Law Group, LLC, and Attorney, Mary Elizabeth Bogan ("Movant"), respectfully request that they be permitted to withdraw as counsel for Plaintiff, Paige Robbins, and in support thereof, aver as follows:

- 1. Movant was retained to represent the above-named Plaintiff in connection with allegations involving an invasion of privacy rights, civil rights violations, *inter alia*, brought against Defendants, Lower Merion School District, Board of Directors for the Lower Merion School District, and Christopher W. McGinley.
- 2. Movant has diligently served as Plaintiff's counsel throughout these proceedings which have only recently been initiated.
- 3. It has become clear, during the representation of Plaintiff, that counsel has irreconcilable conflict(s) with the client which, in turn, has resulted in the filing of the immediate

Motion.

- 4. Furthermore, counsel is prepared to discuss with the court, *in camera*, the nature and substance of the basis that necessitated the submission of the within Motion.
- 5. Movant notified Defendants that Movant is filing a Motion for Permission to Withdraw as Counsel.
- 6. Moreover, Movant has taken reasonable steps to avoid foreseeable prejudice to the rights of Plaintiff, including, but not limited to, advising the client of the within filing.

WHEREFORE, Movant respectfully requests this Honorable Court permit them to withdraw their appearance, and enter the Order attached hereto.

Respectfully submitted,

Bogan Law Group, LLC

By:

Mary Elizabeth Bogan, Esquire 1800 John F. Kennedy, Suite 300

Philadelphia, PA 19103

(215) 385-5254

Attorney for Movant

VERIFICATION

Mary Elizabeth Bogan, Esquire, hereby makes this Verification; and states that the facts set forth in the foregoing Motion for Permission to Withdraw as Counsel are true and correct to the best of my knowledge, information and belief, subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities.

By:

Mary Elizabeth Bogan, Esquire

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Defendants.

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CERTIFICATE OF SERVICE

I, Mary Elizabeth Bogan, Esquire, hereby certify that I caused a true and correct copy of the foregoing Motion for Permission to Withdraw As Counsel to be served as follows on December 13th, 2011:

Via Regular Mail

Paige Robbins 437 Hidden River Road Penn Valley, PA 19072

Via Regular Mail

LOWER MERION SCHOOL
DISTRICT
301 East Montgomery Avenue
Ardmore, PA 19003

<u>Via Regular Mail</u>
Board of Directors of the LOWER MERION SCHOOL **DISTRICT** 301 East Montgomery Avenue Ardmore, PA 19003

<u>Via Regular Mail</u> Christopher W. McGinley Superintendent of LOWER MERION SCHOOL DISTRICT 301 East Montgomery Avenue Ardmore, PA 19003

By:

Mary Elizabeth Bogan, Esquire 1800 John F. Kennedy, Suite 300 Philadelphia, PA 19103

(215) 385-5254

Attorney for Movant